

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**Docket No. 2019-176-E**

In re: )  
 South Carolina Energy Freedom )  
 Act (H.3659) Proceeding to )  
 Establish Each Electrical Utility's )  
 Standard Offer, Avoided Cost )  
 Methodologies, Form Contract )  
 Power Purchase Agreements, )  
 Commitment to Sell Forms, )  
 and Any Other Terms or )  
 Conditions Necessary )  
 (Includes Small Power Producers )  
 as Defined in 16 United States )  
 Code 796, as Amended) )

**PETITION TO INTERVENE  
 OF JOHNSON DEVELOPMENT  
 ASSOCIATES, INC.**

**Petition to Intervene of Johnson Development Associates, Inc.**

Johnson Development Associates, Inc. ("JDA"), in accordance with SC Code of Laws § 58-41-20 and SC Code Regs. 103-825, submits this petition to intervene in the subject docketed proceeding. In support of this petition, JDA provides the following:

1. On May 23, 2019, the Public Service Commission of South Carolina ("Commission") filed an application to open Docket 2019-176-E in accordance with South Carolina's Energy Freedom Act ("The Act").
2. The Commission has not yet established a procedural schedule for this application. As such, JDA's petition is timely filed.
3. JDA is a South Carolina Corporation, founded in 1986 and headquartered at 100 Dunbar Street, Spartanburg, South Carolina, 29306. JDA is a multi-division developer of industrial, multi-family, self-storage, renewable energy, and commercial projects.

4. JDA has a direct and substantial interest in the outcome of this proceeding, and will be directly affected by the discussion and resolution of the topics covered therein. JDA's position and market presence relates directly to the details of this proceeding concerning each electrical utility subject to this Act. JDA has qualifying facilities under development or positioned in the service territories and interconnection queues of each electrical utility subject to this Act and will be impacted by the decisions this Commission makes regarding the selection of an avoided cost methodology, calculation of the avoided cost, the term of length in years that the utility must offer for power purchase agreements to qualifying facilities, and the other terms and conditions this Commission finds necessary to implement the provisions of H. 3659. JDA has a substantial and specific economic interest in the implementation of H. 3659 and in the development of renewable energy in South Carolina as JDA currently develops renewable energy projects in South Carolina. JDA's interest in this proceeding cannot be adequately represented or protected by any other party.
5. Pursuant to SC Code Regs. 103-804(T), JDA is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

[Signature page to follow]

Respectfully submitted this 11th day of June, 2019.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: s/James H. Goldin

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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2019-176-E, listed below, a copy of the foregoing Petition to Intervene of Johnson Development Associates, Inc. via U.S. Mail and electronic mail on this day, June 14, 2019.

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/s/ James H. Goldin  
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